From: MCCLINCY Matt

To: <u>Eric Blischke/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA</u>

Cc: ANDERSON Jim M; LARSEN Henning

Subject: Pdx Harbor TZW Meeting
Date: 06/22/2007 12:22 PM

Eric,

I scheduled Room E at DEQ NWR from 1 to 5 on Wed. June 27th for the follow up TZW meeting.

Regarding:

Gunderson: I talked with Dana last night and clarified the data gaps questions. The recommendations that Dana made are specific to the identified discharge area. The upper portion of the plume discharges in this area. Dana's point was that there are specific areas, based on channel depth, that should be sampled to obtain the maximum contaminant concentrations within this area.

He also recommended deeper samples in areas where the TZW stations were ND. The idea behind the deeper samples would be to try and tag the deeper portion of the plume in an attempt to understand its orientation and concentration further off-shore.

Dana's recommendations did not get at the deeper portion of the plume which projects beneath the discharge areas mapped by the LWG. Whether this portion of the plume, which has the higher contaminant levels, discharges to the river, where and at what concentrations is an unknown.

DEQ will continue to require the operation of the Gunderson source control measure until the upland contaminant levels drop below SLVs or other risk-based levels determined by the in-water process. I discussed this remnant plume with Jim, DEQ in this instance would be ok with a presumed natural attenuation remedy for the deeper portion of the plume. So, we are not going to push EPA into requiring this to be mapped out. Consequently, the ball is in your court for determining RI data needs.

Willbridge: I will work on having Henning at Wednesdays meeting.

PEO: I will check in with Keith after Monday's PEO meeting and let you know where things stand.

RPAC: Our source control strategy will be to require RPAC to carry the entire (riverfront) groundwater plume into a alternatives evaluation for source control. DEQ is going to assume that the upland plume discharges to the river and require them to control it to the extent feasible. If RPAC wanted to make the argument that the plume was not discharging to the river they have not collect the data necessary to show this. Should they suddenly decide that this is something that they want to do and limit the scope of the alternatives evaluation, DEQ and EPA need to agree that this is 1. appropriate, and 2. RPAC needs to get this work done this summer/fall. As to the in-water characterization needs ???? The near shore TZW expression should be within a SMA which will require the groundwater loading term to be better quantified. I discussed the deep plume further with Tom Roick, and he is not sure whether he is comfortable letting this go given the uncertainty with the dioxin question and what upland source control is going to look like. Let me know if you want to discuss this further prior to Wednesday meeting.

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